

EXHIBIT F

Hays Financial Consulting, LLC

2964 Peachtree Road
Suite 555
Atlanta, GA 30305-2153

SEC v CryptoFX
John Lewis, Receiver

For the Period from 9/29/2022 to 12/31/2022

January 13, 2023

Professional Services

	<u>Hours</u>	<u>Amount</u>
Accounting	17.50	4,830.00
Asset Analysis & Recovery	39.70	10,952.80
Asset Disposition	7.90	2,214.80
Business Analysis	71.10	19,127.40
Business Operations	43.40	13,999.40
Case Administration	54.20	17,351.00
Claims Administration & Objections	1.30	358.80
Data Analysis	61.30	17,829.80
Forensic Accounting	7.00	1,932.00
Litigation Consulting	117.70	35,059.40
Status Reports	22.20	7,907.40
Tax Issues	4.60	1,269.60
For professional services rendered	447.90	\$132,832.40

Additional Charges :

Copying Cost	15.30
Expense Reports	2,074.64
Online & Other Research/Reports	4.50
Pacer Charges	53.70
Total costs	\$2,148.14

Total amount of this bill	\$134,980.54
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For the Period from 9/29/2022 to 12/31/2022

January 13, 2023

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
Dwaine A. Butler	51.10	8,687.00
	170.00/hr	
James R. Jennings, CPA	2.00	552.00
	276.00/hr	
S. Gregory Hays, CTP, CIRA	170.10	61,576.20
	362.00/hr	
Scott S. Askue	224.70	62,017.20
	276.00/hr	
For professional services rendered	447.90	\$132,832.40

Additional Charges :

Copying Cost	15.30
Expense Reports	2,074.64
Online & Other Research/Reports	4.50
Pacer Charges	53.70
Total costs	\$2,148.14

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January 13, 2023

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
	<u>Accounting</u>			
10/10/2022	SSA	Reviewed accounting documents produced to the SEC. Noted transactions and documents. Drafted email to receiver team regarding lease and other issues.	5.30 276.00/hr	1,462.80
10/20/2022	SSA	Reviewed issues regarding authority to pay receivership expenses. Emails with Sonila Themeli regarding same.	0.50 276.00/hr	138.00
	SSA	Drafted letter to First Community Credit Union regarding closing account and transfer of funds to the Receiver.	0.80 276.00/hr	220.80
	SSA	Drafted letter to Simmons Bank regarding close of account and transfer of funds to the Receiver.	0.80 276.00/hr	220.80
	SSA	Drafted letter to Bank of America regarding close of account and transfer of funds to the Receiver.	0.80 276.00/hr	220.80
10/25/2022	SSA	Reviewed emails regarding settlement of amounts owed to BZO Wheel for rent at 1124 Blalock. Reviewed for historic payments and payments of utilities.	0.60 276.00/hr	165.60
	SSA	Drafted email to Lance Morgan at FCCU regarding turnover of funds to the Receiver.	0.30 276.00/hr	82.80
10/26/2022	SSA	Drafted email to Hunter Windle of Simmons Bank regarding follow up of transfer of funds.	0.10 276.00/hr	27.60
10/27/2022	SSA	Drafted email to the Receiver regarding funds received from First Community Credit Union.	0.20 276.00/hr	55.20
	SSA	Drafted email to Robert Burford with wire instruction for the transfer of his retainer.	0.20 276.00/hr	55.20
	SSA	Telephone call from Bank of America regarding transfer of funds.	0.20 276.00/hr	55.20
10/28/2022	SSA	Drafted email to David Gerger regarding wire transfer of funds.	0.10 276.00/hr	27.60
10/31/2022	SSA	Drafted email to Hunter Windle of Simmons Bank regarding production of records.	0.20 276.00/hr	55.20
11/1/2022	SSA	Drafted emails to and reviewed email from receiver banking representative regarding payment of funds into receivership estate.	0.30 276.00/hr	82.80
	SSA	Drafted email to Bank of America regarding payment of funds to the Receiver.	0.20 276.00/hr	55.20
11/2/2022	SSA	Drafted email to Hunter Windle of Simmons Bank regarding turnover of funds to the Receiver.	0.30 276.00/hr	82.80
11/3/2022	SSA	Prepared updated asset/recovery report and notes to same.	0.40 276.00/hr	110.40
11/4/2022	SSA	Researched and drafted memo regarding payments to Taffinder family.	0.30 276.00/hr	82.80

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/8/2022	SSA	0.30	82.80
		276.00/hr	
	SSA	0.30	82.80
		276.00/hr	
11/11/2022	SSA	0.40	110.40
		276.00/hr	
11/15/2022	SSA	0.20	55.20
		276.00/hr	
	SSA	0.20	55.20
		276.00/hr	
	SSA	1.00	276.00
		276.00/hr	
11/16/2022	SSA	0.30	82.80
		276.00/hr	
11/21/2022	SSA	0.30	82.80
		276.00/hr	
11/22/2022	SSA	0.20	55.20
		276.00/hr	
12/1/2022	SSA	2.50	690.00
		276.00/hr	
12/14/2022	SSA	0.20	55.20
		276.00/hr	
	Subtotal	17.50	4,830.00

Asset Analysis & Recovery

10/3/2022	SSA	1.00	276.00
		276.00/hr	
10/4/2022	SSA	0.20	55.20
		276.00/hr	
	SSA	0.60	165.60
		276.00/hr	
10/5/2022	SSA	0.60	165.60
		276.00/hr	
	SSA	0.30	82.80
		276.00/hr	
10/11/2022	SSA	3.20	883.20
		276.00/hr	
	SSA	2.00	552.00
		276.00/hr	
10/12/2022	SSA	2.00	552.00
		276.00/hr	

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/12/2022	SSA	2.50 276.00/hr	690.00
10/13/2022	SSA	2.40 276.00/hr	662.40
10/14/2022	SSA	1.90 276.00/hr	524.40
10/18/2022	SSA	3.10 276.00/hr	855.60
10/19/2022	SSA	1.20 276.00/hr	331.20
10/20/2022	SSA	0.30 276.00/hr	82.80
10/21/2022	SSA	0.30 276.00/hr	82.80
10/25/2022	SSA	1.10 276.00/hr	303.60
	SSA	2.20 276.00/hr	607.20
10/26/2022	SSA	2.30 276.00/hr	634.80
	SSA	2.20 276.00/hr	607.20
	SSA	0.50 276.00/hr	138.00
10/27/2022	SSA	0.50 276.00/hr	138.00
11/3/2022	SSA	0.30 276.00/hr	82.80
11/4/2022	SSA	0.40 276.00/hr	110.40
11/8/2022	SSA	0.50 276.00/hr	138.00
11/16/2022	SSA	0.20 276.00/hr	55.20
11/17/2022	SSA	0.40 276.00/hr	110.40
11/18/2022	SSA	0.30 276.00/hr	82.80
11/22/2022	SSA	0.20 276.00/hr	55.20
12/2/2022	SSA	0.60 276.00/hr	165.60
12/7/2022	DAB	2.40 170.00/hr	408.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	commission payments. Researched Liberty County property records for Ismael Sanchez property ownership information. Drafted emails to and reviewed email from Greg Hays regarding pending issues.		
12/10/2022	SGH Research regarding PLS Check Cashiers and the estimated \$500,000 in Money Order purchased in August and September 2022. Prepared PDF and drafted email to Receiver Team regarding subpoena to PLS Check Cashiers.	0.70 362.00/hr	253.40
12/13/2022	DAB Researched county tax records regarding ongoing fraud activity and poperty of Ismael Sanchez. Reviewed and responded to email from Greg Hays regarding verification of property ownership.	0.40 170.00/hr	68.00
12/14/2022	SGH Research regarding crypto tracers and email to Receiver.	0.30 362.00/hr	108.60
	SSA Drafted email to Sonila Themeli regarding service of subpoena to Blockchain.com.	0.20 276.00/hr	55.20
12/19/2022	SGH Drafted email to Bitcoin Tracing expert.	0.20 362.00/hr	72.40
12/20/2022	SGH Zoom call with Sonila Themeli and James Daniel regarding cryptocurrency tracing and employing his firm Blocktrace.	0.50 362.00/hr	181.00
12/28/2022	SGH Research regarding Micro Center and an Apple Mac Mini computer purchased by Chavez. Searched Relativity for new terms Mac Mini. Download list of computer equipment from first report and email to Dwaine Butler regarding preparing a list of equipment we have on the list to compare for missing computers purchased by CryptoFX. Attempting to find document were Chavez purchased the Mac Mini with CFX funds. Reviewed Chavez 2020 tax return for list of equipment. He did record \$97K in business equipment purchases in 2020.	0.80 362.00/hr	289.60
12/29/2022	SGH Drafted email to Receiver regarding employing BlockTrace and James Daniels to trace Bitcoin and cryptocurrency. Email to James Daniels regarding same.	0.40 362.00/hr	144.80
	SGH Researched information in Relativity. Email to Scott Askue regarding jewelry to search for.	0.50 362.00/hr	181.00
	Subtotal	39.70	10,952.80

Asset Disposition

10/10/2022	SGH Researched motion to sell real property and sent copy to the receiver and drafted email regarding procedures to sell real property in receivership.	0.40 362.00/hr	144.80
10/11/2022	SSA Reviewed and responded to email from Sonila Themeli regarding sale of vehicles.	0.20 276.00/hr	55.20
10/12/2022	SSA Drafted email regarding issues with 1124 Blalock and matters to consider in settlement with the landlord. Researched for and reviewed various invoices from Cort Furniture regarding rented furniture and possible return of same.	0.80 276.00/hr	220.80
10/17/2022	SSA Drafted email to Michael Cianfrani at Coinbase regarding liquidation of holdings.	0.30 276.00/hr	82.80

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/17/2022	SSA	Compiled invoices from Cort Furniture itemizing the furniture for pickup of same.	0.70 276.00/hr	193.20
10/20/2022	SSA	Drafted follow up email to Michael Cianfrani of Coinbase regarding liquidation of holdings.	0.20 276.00/hr	55.20
	SSA	Reviewed filed and prior correspondences and drafted email to Derek Wetmore of Paul Hastings regarding liquidation of Blockchain.com account.	0.30 276.00/hr	82.80
10/24/2022	SSA	Drafted email to Michael Cianfranti regarding liquidation of crypto currencies.	0.30 276.00/hr	82.80
10/25/2022	SSA	Reviewed for language appropriate for real property listing agreement by a fiduciary. Drafted email to Sonila Themeli regarding same.	0.40 276.00/hr	110.40
10/27/2022	SSA	Researched for contact information for Michael Cianfrani of Coinbase.	0.20 276.00/hr	55.20
10/31/2022	SSA	Arranged for the transfer of funds from Blockchain.com to the receiver's account.	0.40 276.00/hr	110.40
11/1/2022	SSA	Reviewed for status of requests to liquidate Coinbase account. Drafted email to Samantha Lawson regarding subpoena and liquidation of account.	0.50 276.00/hr	138.00
	SSA	Reviewed and drafted comments on the listing agreement for the CBT properties.	0.40 276.00/hr	110.40
11/3/2022	SSA	Drafted letter to Coinbase to liquidate account.	0.40 276.00/hr	110.40
11/9/2022	SSA	Drafted email to Radames Darby regarding status of Coinbase liquidation.	0.20 276.00/hr	55.20
11/15/2022	SSA	Drafted email to realtor regarding access to properties. Researched issues for sale of same.	0.50 276.00/hr	138.00
	SSA	Drafted email to Radames Darby of Coinbase regarding status of wire transfer to the Receiver.	0.20 276.00/hr	55.20
11/16/2022	SSA	Reviewed and replied to emails from listing agents for CBT properties.	0.30 276.00/hr	82.80
11/17/2022	SSA	Downloaded and reviewed letter from Coinbase. Drafted email to the Receiver regarding liquidation of coins and account.	0.80 276.00/hr	220.80
12/2/2022	SSA	Reviewed and verified content of Bill of Sale for personal property at Blalock. Drafted email to parties regarding potential SBA loan.	0.40 276.00/hr	110.40
Subtotal			7.90	2,214.80

Business Analysis

11/1/2022	SSA	Researched for business involvement of Mr. Taffinder with the Defendants.	0.30 276.00/hr	82.80
11/4/2022	SSA	Researched for contact and background information for "Norma" a critical employee of CryptoFX.	0.50 276.00/hr	138.00
11/8/2022	SSA	Researched for information on 'Norma' and involvement in operations and relationship to parties.	0.70 276.00/hr	193.20
	DAB	Continued to review documents in support of employee and sales agent investigations. Reviewed and researched employee contact information and additional operating entities.	0.70 170.00/hr	119.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/11/2022	DAB	1.40	238.00
		170.00/hr	
	SGH	0.40	144.80
		362.00/hr	
11/17/2022	SSA	0.70	193.20
		276.00/hr	
11/18/2022	SSA	6.80	1,876.80
		276.00/hr	
11/21/2022	SGH	2.00	724.00
		362.00/hr	
11/23/2022	SGH	1.00	362.00
		362.00/hr	
11/24/2022	SGH	2.00	724.00
		362.00/hr	
11/25/2022	SGH	3.00	1,086.00
		362.00/hr	
11/30/2022	SSA	1.80	496.80
		276.00/hr	
12/2/2022	DAB	1.40	238.00
		170.00/hr	
12/3/2022	SGH	1.00	362.00
		362.00/hr	
12/5/2022	DAB	1.80	306.00
		170.00/hr	
12/10/2022	SGH	1.20	434.40
		362.00/hr	

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/11/2022	SGH	3.20 362.00/hr	1,158.40
	Prepared detailed daily analysis of Delivery "Entrega" Cash to Maruicio that totals \$41 million. Reviewed Relativity for daily cash reports. Prepared a Excel file by day since May of 2021 to September of 2022 of all funds shown as transferred and named "Entrega Cash" and or "Entrega Mauricio". Drafted email to Receiver Team regarding the analysis and the total amount of \$41 million apparently given to Defendant Chavez.		
12/12/2022	SSA	2.50 276.00/hr	690.00
	Reviewed records for documents and compiled information regarding funds raised by the 'leaders' and flow of funds by same.		
	SGH	0.80 362.00/hr	289.60
	Updated analysis of the \$41 million cash paid to Chavez and prepared a graph of the cash paid to Chavez. Requested Dwaine Butler to retrieve all the supporting documents and organize in date order. Drafted email to Receiver Team regarding the cash analysis.		
	SGH	0.60 362.00/hr	217.20
	Reviewed and researched issue regarding cash transferred to sales agents and office procedures.		
	SGH	1.50 362.00/hr	543.00
	Continued to research issues in Relativity on cash procedures and payment to Sale Agents.		
12/13/2022	DAB	2.40 170.00/hr	408.00
	Reviewed and updated revenue schedule. Input data for the determination of net daily revenue. Organized daily activity reports by date order.		
	SGH	0.70 362.00/hr	253.40
	Prepared a template for Dwaine Butler to prepare an analysis of the daily cash activity. Reviewed available information and instructed Dwaine Butler on what we need. Reviewed cash and rollover issues with Scott Askue to determine what we capture in the analysis. Prepared template.		
	SGH	0.70 362.00/hr	253.40
	Developed a graph of the total revenue and the total cash to Chavez. Updated the spreadsheet analysis for Dwaine Butler to complete inputting the 2021 data.		
	SSA	0.20 276.00/hr	55.20
	Prepared employee list and supporting documents for same.		
	SSA	3.20 276.00/hr	883.20
	Prepared documents relating to leader Juan Gomez and the structure of leader transactions. Telephone call to Sonila Themeli regarding same.		
12/14/2022	DAB	2.40 170.00/hr	408.00
	Continued to review daily cash reports and input data for the determination of daily net revenue. Reviewed total revenue, rollover amount, and daily revenue.		
	SGH	0.80 362.00/hr	289.60
	Reviewed the updated analysis from Daily reports. Updated the chart of total revenue of \$283 million and the cash to Chavez of \$41 million. Drafted email to receiver team.		
12/15/2022	SGH	0.40 362.00/hr	144.80
	Reviewed handwritten reports of revenues and commissions before May 2021.		
	DAB	1.80 170.00/hr	306.00
	Continued to review Relativity documents for Leaders information and determination of leader commission structure. Reviewed several files and input new leader names into excel schedule.		
12/16/2022	DAB	1.60 170.00/hr	272.00
	Downloaded 2021 and 2022 monthly cash reports and organized for future reference. Continued to update daily revenue and cash report. Reviewed and responded to emails from Greg Hays regarding same.		

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/16/2022	DAB	Input new data and supporting documents for leaders list.	0.60 170.00/hr	102.00
12/19/2022	SGH	Research information in Relativity regarding principal security employees that were employed by Chavez. We have two security officer name and a delivery driver.	0.50 362.00/hr	181.00
	SGH	Research Relativity regarding prior investment offerings and sales reports for 2020 to complete the analysis of the total funds raised.	1.10 362.00/hr	398.20
	SGH	Updated the chart of total funds raised with the First Quarter 2021 data located. Total revenue is now over \$300 million. Email to Receiver Team regarding same.	0.70 362.00/hr	253.40
	DAB	Continued to download monthly cash reports for the determination of total revenue and transfer activity. Organized monthly cash reports for further review. Reviewed and responded to emails from Greg Hays regarding discovery of 2020 daily revenue reports. Reviewed Relativity and researched daily transaction detail.	2.70 170.00/hr	459.00
	SSA	Researched and drafted email memo regarding drivers and security guard contacts.	0.60 276.00/hr	165.60
	SSA	Reviewed document produced by Julio Taffinder relating to out of state leaders and sales generated by same in year 2022.	1.30 276.00/hr	358.80
12/20/2022	DAB	Researched idiCore for information for Man Wong and John Mann. Reviewed comprehensive reports for determination of contact information. Continued to review employee list for leader information.	0.80 170.00/hr	136.00
	SGH	Research and analysis regarding the payments to leaders and the post receiver appointment transactions. Prepared an analysis of \$4.8 million in transaction between 10/3/22 and 10/14/22. Discussed the analysis with Scott Askue and searched Relativity for other documents to support the analysis. Drafted email to Sonila Themeli and Receiver regarding the analysis and how to explain the issue in the contempt motion to be filed this week.	2.50 362.00/hr	905.00
	SGH	Reviewed information regarding leaders and email to Dwaine Butler who is keeping track of the leaders.	0.50 362.00/hr	181.00
	SGH	Research regarding payments delivered by Chino as listed on the leaders spreadsheets. Reviewed reports regarding "Chino" whose real name is Man Loi Wong. Reviewed information regarding Joseph Fitzgerald Mann that worked in security.	0.60 362.00/hr	217.20
	SGH	Updated the graph of the funds raised with additional data of the BTC price during the time the \$300 million was raised.	0.60 362.00/hr	217.20
	DAB	Continued to review hand written cash report documents and input daily revenue amounts. Reviewed First Quarter monthly reports and input amounts. Reviewed email from Greg Hays regarding retrieval of 2020 daily revenue reports. Identified transactions for input to net revenue summary.	1.80 170.00/hr	306.00
12/21/2022	SGH	Updated analysis and chart of total revenue.	0.60 362.00/hr	217.20

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/21/2022	DAB Updated leaders list with commission structure and leader location. Discussed issues with Greg Hays regarding research of specific employee information. Reviewed Relativity for documentation regarding commission and double bonus recipients.	1.40 170.00/hr	238.00
12/22/2022	DAB Updated leaders analysis. Reviewed Relativity and researched leader information and daily revenue reports. Discussed issues with Greg Hays regarding collection of leader data and relative information. Reviewed idiCore for Claudia Bustamantes contact information.	0.80 170.00/hr	136.00
12/23/2022	DAB Relativity research of insider and leader correspondence and communications. Discussed issues with Greg Hays regarding review of leader commission emails.	0.40 170.00/hr	68.00
12/27/2022	DAB Reviewed reverse directory for information regarding sales agents and leaders. Researched idiCore for location detail and compared to Relativity email searches.	1.60 170.00/hr	272.00
12/28/2022	DAB Researched Relativity for leader contact information and commission payout details. Continued to update leader spreadsheet with information. Discussed issues with Greg Hays regarding review of computers purchased by parent company.	1.20 170.00/hr	204.00
12/29/2022	DAB Continued to research leaders and sales agents in Relativity. Located additional leaders and search for payments as we estimate over \$20 million paid in commissions. Reviewed leader bonus structure for the determination of leader commission designation. Discussed issues with Greg Hays regarding research of specific employees. Reviewed idiCore for location and contact information.	1.30 170.00/hr	221.00
Subtotal		71.10	19,127.40

Business Operations

10/14/2022	SGH Reviewed and responded to emails on variety of operational issues.	0.40 362.00/hr	144.80
10/17/2022	SGH Research regarding alleged on-going business operations. Searched social media sites for any on-going communications with investors. Drafted email to receiver team regarding Facebook, LinkedIn, Blog, website, news comments, and other social media posts.	0.60 362.00/hr	217.20
11/2/2022	SGH Reviewed and responded to emails regarding on-going sales activities. Research the alleged on-going fraud.	0.80 362.00/hr	289.60
11/3/2022	SSA Researched records for information on facility in the Chicago area.	0.40 276.00/hr	110.40
	SGH Telephone call to contact in Chicago regarding investigation on-going activity on W. Cermak address. Drafted email to investigator. Worked on locating investigator to research the alleged on-going investor activity in Kenner, LA.	0.90 362.00/hr	325.80

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/4/2022	DAB Research regarding address and contact infor for on-going activities. Reviewed employee and investors schedule for additional information to locate mailing address and recent contact information. Researched IDI Core for employee query.	0.60 170.00/hr	102.00
11/7/2022	SGH Reviewed issues regarding alleged on-going fraud. Email with contact in Chicago regarding investigation. Reviewed news article and call to lawyer in New Orleans representing victims. Email to attorney Roni Gonzales, who represents investors, regarding same.	0.80 362.00/hr	289.60
11/8/2022	SGH Reviewed and researched issues regarding on-going business operations. Followed up with contacts to research.	0.50 362.00/hr	181.00
11/10/2022	SGH Telephone call from investigator Fred Sodetz regarding his investigation of the Chicago office. Drafted email to Receiver regarding same with recommendations of next steps regarding the Chicago office.	1.20 362.00/hr	434.40
11/11/2022	SGH Research regarding the on-going activity by CryptoFX employees in Chicago. Text to Receiver for approval to move forward with Chicago investigation. Prepared notice to post on the door in Chicago and sent to Frank Sodetz. Drafted a list of questions to use with former employees regarding operations. Reviewed Chavez deposition and exhibits and located information regarding former employees and reviewed research and contact information. Drafted several emails to Frank Sodetz. Spent all afternoon researching issues for the alleged on-going activity in Chicago.	5.00 362.00/hr	1,810.00
	SGH Research regarding on-going Louisiana operations.	0.40 362.00/hr	144.80
	SSA Reviewed and edited questions for Chicago employees and agents.	0.30 276.00/hr	82.80
11/14/2022	SGH Research and follow up on all issues regarding the potential on-going investor activity and communications not authorized by the Receiver in Kenner, LA and Chicago, IL. Contact Frank Soletz regarding this plans to investigate and obtaining a copy of the Chicago lease. Followed up on issues we plan to investigation. Drafted email to several parties in Kenner that have contacted the Receiver or that have been alleged to be involved in communicating with investors. Reviewed investor list for phone numbers. Contact the Kenner Police Department given the news article regarding the 120 investors that went to the police. Call to the SEC investigator who the Kenner Police are referring calls.	2.50 362.00/hr	905.00
	SGH Reviewed investor documents in the Kiteworks share file program for any information or calls regarding on-going activity.	0.70 362.00/hr	253.40
	DAB In connection with on-going investor activities, performed reverse directory search via idiCORE for investor contact information. Drafted emails to and reviewed emails from Greg Hays regarding investor identification and contact information. Continued to review WhatsApp communications for investor information. Translated specific communications.	1.40 170.00/hr	238.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/15/2022	SGH	Updated analysis of the on-going fraud and summarized the issues. Drafted an email to the Receiver regarding same. Corresponded with Valerie Hayes regarding the new office in Houston.	0.60 362.00/hr	217.20
	SGH	Followed-up on emails to investors involved in on-going CFX activities.	0.30 362.00/hr	108.60
11/16/2022	DAB	Reviewed and translated WhatsApp investor communications for the determination of on-going business activity and communications with investors. Performed idiCORE query of named investors and discussed with Greg Hays.	0.80 170.00/hr	136.00
11/17/2022	SGH	Investigation and research regarding on-going communications with investors. Reviewed issues in the Chicago office and emails with Frank Sodetz (.3) Reviewed emails regarding the New Jersey office and leader in that office. Reviewed documents regarding principal and activities. Reviewed investor emails and WhatsApp chats regarding post receiver appointment communications (1.0). Reviewed access to WhatsApp communications and emails with SEC Carol Hahn regarding investor communications and access to the WhatsApp files (1.5). Reviewed and followed-up on the Kenner activities and researched additional information (.5). Reviewed issues regarding Houston office (.5). Began drafting a report of all the on-going activities in various offices (2.0).	5.50 362.00/hr	1,991.00
	DAB	Researched potential business activity and researched Elvia Chalco information. Verified location of New Jersey office. Reviewed idiCore for various names from WhatsApp communications. Reviewed communications and researched specific names from text communication. Drafted email to Greg Hays regarding research efforts and findings.	1.20 170.00/hr	204.00
11/18/2022	SGH	Finalized draft of on-going fraud issues and information on offices in Chicago, Houston, Kenner, New Jersey and California. Research on new locations. Discussion with Dwaine Butler regarding taking over this project and research on the people in these offices. Drafted email to Receiver. Drafted email to Carol Hahn.	2.50 362.00/hr	905.00
	DAB	Reviewed emails from Greg Hays regarding investor research, verification of additional operating office locations, and review of preliminary Receiver report. Reviewed Report. Reviewed several emails from Sonila Themeli and Greg Hays regarding download of WhatsApp correspondence. Updated overview of business locations.	1.80 170.00/hr	306.00
11/21/2022	SGH	Reviewed emails and screen shots regarding on-going fraudulent activity. Researched names in available information. Emails to Receiver team regarding issues for the report. Followed up on pending matter regarding on-going fraudulent activity.	1.20 362.00/hr	434.40
11/23/2022	SGH	Call from an investor regarding on-going fraud. Drafted email to Receiver Team regarding same.	0.40 362.00/hr	144.80
11/28/2022	SGH	Edited information regarding on-going fraud for the First Interim Report.	0.80 362.00/hr	289.60

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/29/2022	SGH	Telephone call to Carol Hahn of SEC regarding the on-going fraud and conversations with investors regarding payments and new fund raising. Discussed issues in the Receiver's report regarding on-going investor activities.	0.40 362.00/hr	144.80
11/30/2022	DAB	Researched business principal information for address and location. Reviewed and responded to emails from Greg Hays regarding principal's communications with investors and translation of WhatsApp messaging.	0.40 170.00/hr	68.00
	SGH	Reviewed issues regarding on-going fraud and additional research regarding on-going activities. Considered reporting requirements and drafted email regarding same.	1.20 362.00/hr	434.40
12/1/2022	DAB	Reviewed emails from Brandon Tyner and Levi Percy regarding access to Relativity documents. Accessed database to search on going fraud activity and specific investors. Researched detail for Ismael Sanchez, Jeannette Gonzalez, and Yvonne Madrid. Researched idiCore for 24/7 entity. Reviewed employee spreadsheet and researched employee detail.	2.40 170.00/hr	408.00
	SGH	Reviewed emails regarding Chicago activity. Email to Frank Sodetz in Chicago regarding next steps (.4). Researched information regarding Chicago Operatives (.7). Researched Relativity for information regarding Chicago contacts (.8).	1.90 362.00/hr	687.80
12/2/2022	SGH	Updated report of on-going fraud. Call to Carol Hahn of SEC. Drafted email to Receiver Team regarding on-going fraud and issues to investigate. Researched issues in Relativity.	2.00 362.00/hr	724.00
12/7/2022	SGH	Updated the report of on-going fraud and drafted email to Receiver Team regarding same and issues regarding the allegations of on-going fund raising.	1.50 362.00/hr	543.00
12/9/2022	SGH	Telephone call from Carol Hand of SEC regarding on-going fraud and issues in the case regarding investors, leaders, and commissions.	0.30 362.00/hr	108.60
12/12/2022	SGH	Responded to email regarding on-going fraud and updated report and circulated. Reviewed drafts of letter regarding on-going fraud.	0.90 362.00/hr	325.80
12/15/2022	SGH	Reviewed pending matters. Telephone call to Carol Hahn at SEC regarding on-going fraud in local offices.	0.80 362.00/hr	289.60
	Subtotal		43.40	13,999.40

Case Administration

9/30/2022	SGH	Participated in planning call with Receiver Team (1.0). Researched issues regarding 30(b)(6) and pleading 5th amendment. Retrieved documents and case law and sent email to Receiver Team regarding same (.5). Call from Scott Askue regarding budget for Defendant. Drafted language to send to Defendant's counsel (.3).	1.80 362.00/hr	651.60
	SSA	Reviewed pleadings filed to date while traveling from Atlanta to Houston.	2.20 276.00/hr	607.20
	SSA	Met with the Receiver and Caroline Gieser to review Blalock facility and case issues. Reviewed various documents located in same. Conference call with team	4.30 276.00/hr	1,186.80

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		<u>Hrs/Rate</u>	<u>Amount</u>
	regarding recoveries and administration. Drafted email to legal department at Coinbase regarding receivership. Drafted email to Lisa Fern with Title 11 regarding establishing Receiver's bank account.		
10/3/2022	SSA Conference with the Receiver and other parties regarding recoveries and tasks for consideration.	1.40 276.00/hr	386.40
10/10/2022	SGH Conference call with Receiver Team regarding pending matters.	1.30 362.00/hr	470.60
	SSA Telephone conference with the Receiver Sonila Themeli, Caroline Gieser and Greg Hays regarding various case issues.	1.30 276.00/hr	358.80
10/13/2022	SSA Drafted email to receiver team regarding Receiver's website and establishment of same.	0.20 276.00/hr	55.20
	SSA Reviewed and responded to email of issues to review with counsel for the Defendants.	0.20 276.00/hr	55.20
	SSA Drafted email to Lisa Fern regarding content of the Receiver's website.	0.30 276.00/hr	82.80
10/14/2022	SSA Drafted home page of Receiver's website and drafted and reviewed emails regarding same.	1.30 276.00/hr	358.80
10/17/2022	SGH Participated in weekly call with Receiver Team on pending matters. Researched information requested by the Receiver and sent documents regarding same.	1.30 362.00/hr	470.60
	SSA Drafted email to receiver team regarding communications to investors and obtaining contact information.	0.20 276.00/hr	55.20
	SSA Weekly Receiver team meeting regarding case issues and assigned projects.	1.00 276.00/hr	276.00
10/18/2022	SGH Reviewed and responded to emails from Sonila Themeli and Receiver regarding miscellaneous matters.	0.30 362.00/hr	108.60
	SSA Prepared QR Code for notice for investors to access the Receiver's website.	0.20 276.00/hr	55.20
10/20/2022	SGH Participated in a conference call with Receiver and Receiver team on new developments. Searched for copy of motion to expand receivership and sent to Sonila Themeli. Reviewed and responded to emails from Receiver Team.	1.40 362.00/hr	506.80
	SSA Conference call with Receiver and receiver team regarding various case matters and case strategy.	1.00 276.00/hr	276.00
	SSA Reviewed preview of Receiver's website. Drafted email to vendor regarding edits to same.	0.30 276.00/hr	82.80
	SSA Drafted email to Receiver team regarding required filings by Defendants.	0.20 276.00/hr	55.20
10/21/2022	SGH Reviewed information researched by Dwaine Butler regarding Defendants and employees. Reviewed and responded to emails.	0.40 362.00/hr	144.80
	DAB Reviewed email from Greg Hays regarding review of employee and insider information. Reviewed employee phone numbers and researched current address. Discussed issues with Mr. Hays regarding research findings. Continued to investigate comprehensive reports.	0.60 170.00/hr	102.00
	SSA Reviewed reverse phone directory results of key parties.	0.20 276.00/hr	55.20
10/24/2022	SGH Participated in weekly Receiver team conference call. Discussed issues and recovery priorities and assigned roles.	1.20 362.00/hr	434.40

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/24/2022	DAB	Continued research of insider and employee information. Reviewed name and phone number search for identification of specific notice information.	0.40 170.00/hr	68.00
	SSA	Conference meeting with receiver team regarding case and recovery issues. Drafted emails in follow up of same.	1.50 276.00/hr	414.00
10/27/2022	DAB	Researched employee contact information and continued research of insider information.	0.40 170.00/hr	68.00
10/31/2022	SGH	Participated in the weekly receiver team call. Researched information and sent form to receiver team for employee questionnaire, real estate issues, and attorney-client privilege issues. Reviewed FAQ's and responded with suggestions. Researched information regarding the three new addresses and sent email to Receiver team.	1.80 362.00/hr	651.60
11/3/2022	SGH	Reviewed emails regarding asset recovery and chart of pending recoveries. Email to Receiver Team regarding pending matters including document discovery and pending recoveries.	0.90 362.00/hr	325.80
11/7/2022	SGH	Participated in the weekly receiver team call. Discussed pending matters and assignments for the week.	1.00 362.00/hr	362.00
	SGH	Reviewed receiver's web site and email regarding same.	0.30 362.00/hr	108.60
	SSA	Conference call with the Receiver and receiver team regarding recoveries and other case matters.	1.30 276.00/hr	358.80
11/10/2022	SGH	Reviewed web site, investor communications, docket activities and drafted several emails to the Receiver regarding updates and investor communications. Suggest link to show the entire docket on the Receiver's web site.	0.70 362.00/hr	253.40
11/14/2022	SSA	Weekly meeting regarding case issues and recoveries.	1.30 276.00/hr	358.80
	SGH	Weekly Receiver Team meeting with receiver team including Receiver, Sonila Themeli, Scott Askue and Valerie Hayes.	1.00 362.00/hr	362.00
11/21/2022	SGH	Weekly conference call with the Receiver Team to discuss pending matters and plans for the Receiver's First Interim Report.	1.30 362.00/hr	470.60
	SGH	Reviewed Document Depository agreement from a prior case and email to Receiver regarding access to electronic records. Researched for copy of more recent agreement that is primarily electronic access. Considered document depository issues and email to receiver regarding addressing this issue in the report.	0.80 362.00/hr	289.60
11/28/2022	SGH	Participated in the weekly Receiver Team call regarding the First Interim Report.	1.00 362.00/hr	362.00
	DAB	Continued research of related entities and employee information. Reviewed idiCore for the determination of employee contact information and named businesses. Reviewed Receiver Report. Reviewed several emails from Sonila Themili regarding information for pending depositions.	0.70 170.00/hr	119.00
	SSA	Participated in the weekly receiver team meeting.	1.10 276.00/hr	303.60

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/1/2022	SGH	Reviewed and responded to emails regarding wide variety of issues including Relativity, document production, on-going fraud, pending matters, and planned depositions. Reviewed new documents produced (3.0). Call from Sonila Themeli regarding appraisers and reviewed receiver order and drafted email regarding hiring and paying an appraiser (.5).	3.50 362.00/hr 1,267.00
12/5/2022	SGH	Participated on conference call with Receiver Team regarding on-going matters.	1.20 362.00/hr 434.40
	SGH	Reviewed Receiver Order, converted to Word and sent email to Receiver Team regarding specific provisions or the order regarding sharing documents with the Commission and other key issues. Reviewed issues regarding as Document Depository agreement and sent email regarding same.	2.20 362.00/hr 796.40
	SSA	Video conference with Receiver and Receiver team regarding various recoveries and case management.	1.00 276.00/hr 276.00
12/9/2022	SGH	Research and emails regarding establishing a Document Depository to provide access to Defendants documents to SEC, government agencies, and Defendants. Located the Order for a Document Depository in my Correll case and converted to Word to consider as a go-by to share Defendant documents to make discovery and production more efficient.	2.20 362.00/hr 796.40
12/12/2022	SSA	Weekly meeting with Receiver team to discuss wide variety of pending matters.	1.20 276.00/hr 331.20
	SGH	Zoom call with Receiver Team. Discussed issues for the week and analysis of the \$41 million I prepared yesterday. Discussion regarding motion to expand receivership, recoveries, depositions, sales agents, on-going fraud in certain markets and other issues.	1.30 362.00/hr 470.60
	SGH	Researched issues regarding receiver's and defendants Fifth Amendment issues and drafted email to the Receiver. Reviewed 21 page paper on the issues and summarize in email regarding Defendant's obligation to produce corporate records.	0.60 362.00/hr 217.20
12/13/2022	SGH	Responded to emails from Sonila Themeli.	0.30 362.00/hr 108.60
12/15/2022	SGH	Reviewed and responded to emails.	0.30 362.00/hr 108.60
12/19/2022	SGH	Participated in weekly Receiver Team call and discussed issues and assignments for the week. Requested to assist with supplying information for subpoenas to Google and Microsoft and Salesforce. Discussed contacting Bitcoin tracing expert. Discussed next report and chart of total revenues. Discussed claims against leaders and sales agents.	1.20 362.00/hr 434.40
12/28/2022	SGH	Reviewed the filed Motion for Contempt and downloaded to have posted on Recap website so that it is available to investors. Drafted email to Receiver and Sonila Themeli regarding same. Drafted email to Carol Hahn regarding filing of Motion for Contempt and information available for investors.	0.40 362.00/hr 144.80

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/29/2022	SGH Telephone call to Sonila Themeli regarding the inspection of Chavez property and other houses. Discussed pending matters including Motion to Expand Receivership (.3) Retrieved copies of prior motion in another case and email to Sonila Themeli (.4).	0.70 362.00/hr	253.40
	Subtotal	54.20	17,351.00

Claims Administration & Objections

11/28/2022	SSA Prepared analysis of unique investor phone numbers to estimate total number of investors.	1.30 276.00/hr	358.80
	Subtotal	1.30	358.80

Data Analysis

9/30/2022	SSA Inventoried and secured computers located at facility. Continued review of documents on site.	3.20 276.00/hr	883.20
10/1/2022	SSA At 1124 Blalock, finalized indexing of computers onsite. Gained access to secured cabinets. Reviewed facility for hidden assets. Reviewed content of security system. Discussed matters with investors. Consolidated computer equipment and documents and secured office	7.00 276.00/hr	1,932.00
10/3/2022	SSA Researched for vendors and drafted email to Pathway Forensics regarding imaging of hard drives.	0.30 276.00/hr	82.80
10/5/2022	SSA Telephone call from Halen Phan of Pathway Forensics. Drafted email to Receiver regarding quote for services and services to be provided.	0.70 276.00/hr	193.20
10/7/2022	SSA Drafted email to Jamie Haussecker regarding available documents. Downloaded, extracted and reviewed documents.	2.50 276.00/hr	690.00
10/11/2022	SSA Drafted email to e-discovery vendor.	0.10 276.00/hr	27.60
10/13/2022	SSA Reviewed images from surveillance system and identified additional issues for turnover request. Drafted email regarding same.	0.20 276.00/hr	55.20
10/17/2022	SSA Drafted email to Valerie Hayes at Shook Hardy regarding computer equipment for imaging.	0.10 276.00/hr	27.60
10/24/2022	SSA Researched for information relating to the use of and payments to Salesforce. Drafted email regarding findings.	0.80 276.00/hr	220.80
11/2/2022	DAB Reviewed several emails from Greg Hays and Sonila Themeli regarding data review and Relativity access to available documents. Reviewed Relativity portal for information.	0.60 170.00/hr	102.00
	SGH Drafted email to Receiver regarding Relativity and access.	0.30 362.00/hr	108.60
11/3/2022	SSA Reviewed and analyzed production from Coinbase. Drafted email regarding bank account and transfers of interest.	1.30 276.00/hr	358.80
11/7/2022	SSA Downloaded and started review of document production from Attorney Gerger.	0.40 276.00/hr	110.40
11/10/2022	SSA Reviewed documents produced by Attorney Gerger. Noted transactions of interest.	2.60 276.00/hr	717.60

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/11/2022	SGH	Email to Sonila Themeli regarding data access.	0.20 362.00/hr	72.40
11/14/2022	SSA	Reviewed report of data being imaged. Drafted email regarding drives to prioritize.	0.50 276.00/hr	138.00
11/15/2022	SGH	Reviewed documents recently uploaded in Kiteworks.	0.80 362.00/hr	289.60
	SSA	Reviewed email and report of data available from computer imaging. Drafted email response.	0.30 276.00/hr	82.80
11/16/2022	SSA	Researched and drafted email regarding use and potential transfer of assets from the Ledger Nano obtained from 1124 Blalock.	0.90 276.00/hr	248.40
11/17/2022	SSA	General review of scanned and imaged data.	3.70 276.00/hr	1,021.20
11/21/2022	SSA	Reviewed documents located in Mauricio Chavez's office, researched issues relating to same.	2.20 276.00/hr	607.20
11/23/2022	SGH	Reviewed Relativity documents. Drafted email about subpoena to Microsoft 365 for the on-line files.	1.50 362.00/hr	543.00
11/29/2022	DAB	Reviewed and responded to emails from Greg Hays regarding recovery and download of specific case documents. Reviewed Relativity and researched available case information.	0.80 170.00/hr	136.00
12/1/2022	SSA	Reviewed documents produced by Rapp & Krock. Drafted email regarding same.	3.20 276.00/hr	883.20
12/5/2022	SGH	Researched issues in Relativity and email with Levi Percy and Receiver team regarding access to documents and sorting out the Contract, Closing statements, payroll and other documents. Reviewed documents. Email to Receiver team regarding payment of commission and other issues.	5.00 362.00/hr	1,810.00
	DAB	Continued to review Relativity for related investor and transfer correspondence. Reviewed detailed payroll reports for determination of commission fee structure. Discussed issues with Greg Hays and Scott Askue regarding analysis of investor information and transaction detail.	0.70 170.00/hr	119.00
	SSA	Reviewed files for information regarding use and data captured by Salesforce account. Drafted memo on same.	1.50 276.00/hr	414.00
12/6/2022	SGH	Conference call with Receiver Team on Relativity and reviewing files and gaining access and tagging data.	0.60 362.00/hr	217.20
	SGH	Reviewed Excel files in Relativity and searched for additional information on sales and commissions.	2.00 362.00/hr	724.00
	DAB	Telephone conference call with Levi Percy and Receiver team regarding Relativity database search. Reviewed Relativity database for categorization of investor and employee data.	1.80 170.00/hr	306.00
12/9/2022	SSA	Reviewed paper records and electronic records from 1124 Blalock.	3.20 276.00/hr	883.20
12/10/2022	SGH	Relativity research on wide variety of topics that are under investigation.	2.00 362.00/hr	724.00
12/20/2022	SSA	Researched for use of Salesforce data by employees. Drafted email regarding same.	2.30 276.00/hr	634.80
	SSA	Researched for and drafted email regarding gmail accounts used by employees.	1.10 276.00/hr	303.60

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/20/2022	SSA	Reviewed memo by Kierra Powell regarding conversations with investors. Researched for information relating to same.	0.40 276.00/hr	110.40
	SSA	Reviewed documents produced by Julio Taffinder and content of gmail account of same. Drafted emails on findings relating to Salesforce and content of CFX's account and out of state activity after Receiver appointment.	2.90 276.00/hr	800.40
12/21/2022	SGH	Reviewed issues in Relativity and searched for documents. Email to Levi Percy regarding status of data and Bates stamping the files. Research in Relativity regarding Google email addresses and Microsoft Office emails addresses and data files. Searched for any Microsoft Account number information and sent emails to Sonila Themeli regarding same.	2.00 362.00/hr	724.00
12/23/2022	SGH	Reviewed new documents uploaded to Kiteworks.	1.00 362.00/hr	362.00
12/28/2022	SSA	Reviewed documents produced by Gabriela Longoria.	0.60 276.00/hr	165.60
	Subtotal		61.30	17,829.80

Forensic Accounting

10/21/2022	SSA	Reviewed documents produced to the SEC for issues relating to operations and cash flow. Drafted email to Receiver team regarding cash flow in and out and accounting of same.	2.50 276.00/hr	690.00
11/16/2022	SSA	Reviewed CBT Simmons bank statements and researched for use and transfer of funds. Drafted email memo and prepared analysis of recoverable transfers and supporting documents relating to same. Prepared report of payments by CBT for each property. Researched for information regarding payee and its principals.	4.50 276.00/hr	1,242.00
	Subtotal		7.00	1,932.00

Litigation Consulting

10/3/2022	SSA	Reviewed request to attorneys for Chavez and Benvenuto. Responded with additional items.	0.40 276.00/hr	110.40
10/14/2022	SSA	Telephone call from Dan Cogdell regarding Giorgio Benvenuto issues. Drafted email to the Receiver regarding same.	0.30 276.00/hr	82.80
10/18/2022	SSA	Reviewed budget and supporting documents from Mr. Benvenuto. Prepared analysis of same and drafted recommendation to the Receiver.	1.00 276.00/hr	276.00
	SSA	Read WhatsApp transcript between Chavez and Benvenuto. Prepared notes and researched issues raised from same.	2.20 276.00/hr	607.20
10/24/2022	SSA	Reviewed proposed budget from Mr. Benvenuto. Drafted email to Dan Cogdell regarding the budget, turnover of records, meeting with Mr. Benvenuto, retainer and other case issues.	0.50 276.00/hr	138.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/24/2022	SSA Downloaded and reviewed pleadings filed to date.	1.40 276.00/hr	386.40
10/25/2022	SSA Reviewed and drafted response email to Dan Cogdell regarding sworn statement of Giorgio Benvenuto. Reviewed documents provided and discussed matter with Sonila Themeli.	1.30 276.00/hr	358.80
10/26/2022	SSA Drafted email to and reviewed emails from Dan Cogdell regarding documents provided and budget. Drafted email to Receiver regarding same.	0.30 276.00/hr	82.80
10/28/2022	SSA Telephone call from Dan Cogdell regarding Benvenuto meeting and other issues. Drafted email regarding discussion.	0.40 276.00/hr	110.40
10/31/2022	SSA Researched for information on sales agent Reyna Guifaro.	0.60 276.00/hr	165.60
	SSA Reviewed and noted issues in WhatsApp conversation between Chavez and Benvenuto.	1.70 276.00/hr	469.20
	SSA Drafted email to Dan Cogdell regarding meeting with Mr. Benvenuto.	0.20 276.00/hr	55.20
	SSA Researched for contact information for Janette Gonzalez.	0.30 276.00/hr	82.80
	SSA Reviewed security system photos taken on second day of receivership. Drafted email regarding issues for Motion to show cause.	0.90 276.00/hr	248.40
11/2/2022	SSA Drafted email to Dan Cogdell regarding meeting at Shook Hardy & Bacon.	0.20 276.00/hr	55.20
	SSA Began reading deposition of Giorgio Benvenuto. Drafted notes and comments on issues for upcoming meeting and issues for follow up.	2.00 276.00/hr	552.00
	SSA Reviewed deposition exhibits for Mr. Chavez and Mr. Benvenuto.	2.30 276.00/hr	634.80
11/3/2022	SSA Reviewed and noted issues from Deposition of Giorgio Benvenuto. Drafted outline and questions for meeting with same.	4.20 276.00/hr	1,159.20
	SSA Telephone call to Sonila Themeli regarding meeting with Giorgio Benvenuto tomorrow and other case issues.	0.30 276.00/hr	82.80
11/4/2022	SSA Prepared for and attended meeting with Dan Cogdell and Giorgio Benvenuto.	4.00 276.00/hr	1,104.00
11/7/2022	SGH Reviewed the office lease and drafted email regarding issues in the lease including insurance and the fact that the name of the tenant, CBT, did not actually sign the lease. Lease was signed individually. Considered issues and drafted email to receiver regarding resolving issues with landlord.	1.20 362.00/hr	434.40
	SSA Reviewed and verified content of subpoena to Paypal. Drafted email regarding same	0.30 276.00/hr	82.80
	SSA Reviewed documents received from John Sklar. Drafted email to Sonila Themeli regarding same.	0.40 276.00/hr	110.40
	SSA Reviewed and commented on subpoena to CPAs of defendant Chavez.	0.30 276.00/hr	82.80
11/8/2022	SGH Reviewed documents produced by SEC for CBT Group Operating Agreement in conjunction with pending lease rejection. CBT did not sign the lease and research for what member had the authority to sign the lease. Reviewed prior letter to landlord regarding settlement.	2.20 362.00/hr	796.40

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			<u>Hrs/Rate</u>	<u>Amount</u>
		Email to Sonila Themeli regarding same. Emails to receiver regarding the lease and possible claims against the estate for lease damages.		
11/9/2022	SGH	Reviewed Chavez Answer and Sonila Themeli draft of Motion to Compel Compliance with Receiver Order. Suggested additions to motion.	0.40 362.00/hr	144.80
	SSA	Drafted email to Dan Cogdell with follow ups issues and document request.	0.30 276.00/hr	82.80
11/10/2022	SSA	Reviewed and verified content of Motion to Show Cause.	0.30 276.00/hr	82.80
11/11/2022	SGH	Edited list of interview questions for Chavez wife Angelica Vargus. Email to Sonila Themeli with suggestions.	0.40 362.00/hr	144.80
	SGH	Reviewed legal bills for Defendants and drafted email with suggestion to Sonila Themeli. Addressed issue regarding flash drive.	0.30 362.00/hr	108.60
	SSA	Reviewed and edited list of questions for Angelica Vargas.	0.50 276.00/hr	138.00
11/14/2022	SSA	Reviewed and verified content of declaration in support of Motion to Show Cause.	0.50 276.00/hr	138.00
11/15/2022	SGH	Began drafting a Ponzi scheme report to establish the Ponzi Presumption for litigation. Reviewed SEC complaint and Declaration and added language to report with law regarding the characteristics of a Ponzi scheme.	2.20 362.00/hr	796.40
	SSA	Reviewed and verified content of declaration in support of Motion to Show Cause.	0.60 276.00/hr	165.60
	SSA	Drafted email to Dan Cogdell regarding issues to be addressed by Giorgio Benvenuto.	0.60 276.00/hr	165.60
11/16/2022	SSA	Drafted email regarding proof of Ponzi scheme and proof of same.	0.30 276.00/hr	82.80
11/17/2022	SSA	Reviewed CBT Simmons bank records and drafted email with other potential recoveries and issues to discuss with Mr. Benvenuto.	1.30 276.00/hr	358.80
11/21/2022	SSA	Reviewed and commented on request for documents from Ebenezer Construction.	0.30 276.00/hr	82.80
11/29/2022	SGH	Drafted email to Receiver Team regarding the Microsoft 365 and Google subpoenas (.2). Reviewed pending matters with Scott Askue (.2).	0.40 362.00/hr	144.80
11/30/2022	SSA	Drafted email to Dan Cogdell regarding status of various matters with Mr. Benvenuto.	0.20 276.00/hr	55.20
12/1/2022	SSA	Reviewed and responded to email regarding additional subpoenas.	0.20 276.00/hr	55.20
12/5/2022	SGH	Researched issues regarding filing complaint against Sales Agents. Retrieved prior complaint against Sales Agents. Drafted email to Receiver and Receiver team regarding pursuing claims against Sales Agents to help stop the on-going fraudulent activity. Outlined plan for the Receiver to consider. Reviewed provision in the Receiver Order.	2.10 362.00/hr	760.20
	SSA	Researched for information relating to Janette Gonzalez for upcoming deposition. Researched for information relating to Orlin Turcios and Carmen de la Cruz for same.	4.50 276.00/hr	1,242.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/6/2022	SGH	4.20 362.00/hr	1,520.40
	SSA	0.30 276.00/hr	82.80
	SSA	5.60 276.00/hr	1,545.60
12/7/2022	SGH	3.00 362.00/hr	1,086.00
	SGH	0.40 362.00/hr	144.80
	DAB	0.70 170.00/hr	119.00
12/8/2022	SGH	1.40 362.00/hr	506.80
	SGH	1.00 362.00/hr	362.00
	SGH	0.70 362.00/hr	253.40
	DAB	1.80 170.00/hr	306.00
	DAB	0.70 170.00/hr	119.00
	SSA	3.90 276.00/hr	1,076.40
	SSA	3.50 276.00/hr	966.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/8/2022	SSA	Researched for documents relating to Salvador Reyes.	0.60 276.00/hr	165.60
12/9/2022	SGH	Researched Zeek Rewards case and drafted email to Receiver regarding the use of a Class of Defendants to pursue all claims against Net Winners which would include all commission and bonuses and profits. Reviewed the 40 page complaint and docket in the main Zeek Rewards case. Converted the Complaint to Word, and prepared summary of key issues for Receiver to consider in establishing a class of Defendants to pursue the Net Winner claims.	2.50 362.00/hr	905.00
	SGH	Researched leaders and commissions paid in Relativity. Prepared a list of leaders from Relativity reports in September and August of 2022. Email to Scott Askue, Dwaine Butler and Sonila Themeli.	1.50 362.00/hr	543.00
	DAB	Continued draft of Leaders list. Reviewed and responded to several emails from Greg Hays regarding research of various leaders in Relativity database. Continued to review Relativity for specific information to input into Leaders excel schedule.	2.30 170.00/hr	391.00
	SSA	Prepared summary of contract transactions for Carmen De La Cruz for deposition. Researched for contracts signed by Ms. Cruz.	1.40 276.00/hr	386.40
	SSA	Researched for identifying documents for additional research on leaders.	0.80 276.00/hr	220.80
12/10/2022	SGH	Drafted email to Receiver regarding establishing a defendant class for net winners and need to request leave of court to institute such actions. Researched procedures in the Zeek Rewards case.	1.20 362.00/hr	434.40
	SGH	Drafted email to Dwaine Butler regarding the leaders (called "liders" on spreadsheets) that I researched in Relativity.	0.20 362.00/hr	72.40
12/12/2022	SSA	Researched for documents for Julio Taffinder deposition.	2.20 276.00/hr	607.20
	DAB	Continued draft of Leader list and commission structure chart. Reviewed Relativity and identified specific commission documents. Reviewed and responded to emails from Greg Hays regarding summary of information and research of Double Bonus recipients.	1.70 170.00/hr	289.00
12/13/2022	DAB	Continued to review information regarding leaders and commission structure. Updated directory with employee investigation information.	0.40 170.00/hr	68.00
	SSA	Researched for documents for Julio Taffinder deposition. Processed and compiled same for deposition.	4.60 276.00/hr	1,269.60
12/14/2022	SSA	Reviewed for and compiled documents relating to Maria Saravia. Prepared documents for deposition.	4.80 276.00/hr	1,324.80
12/15/2022	SSA	Reviewed documents relating to exemptions in property in Texas and turnover of assets by Mr. Chavez.	0.50 276.00/hr	138.00
12/16/2022	SGH	Reviewed and responded to emails regarding sales leaders.	0.50 362.00/hr	181.00
12/19/2022	SGH	Researched issues for subpoenas to Google and Microsoft Office 365. Researched account number for a Google account. Searched for gmail addresses with CFX in name. Drafted email to Kierra Powell and Sonila Themeli regarding the subpoenas.	1.40 362.00/hr	506.80

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/19/2022	SGH	Research and drafted email regarding leader Lolly Saravia. Researched information regarding other leaders and commissions paid. Lolly Saravia had over \$2 million raised.	0.70 362.00/hr	253.40
	SGH	Researched CFX marketing information to included as Exhibit in the Ponzi report.	0.40 362.00/hr	144.80
	SSA	Complied records in support of expanding the receivership and drafted notes on same.	3.50 276.00/hr	966.00
12/20/2022	SGH	Research and Zoom call with Sonila Themeli and Scott Askue regarding pending recovery issues. Reviewed and discussed documents on Zoom.	1.20 362.00/hr	434.40
	SGH	Reviewed draft of subpoena to Google and provided email with additional gmail email addresses of employees.	0.60 362.00/hr	217.20
	SGH	Research regarding Ponzi scheme expert report. Saved files to use as exhibits in the report.	0.70 362.00/hr	253.40
	SSA	Video conference with parties relating to activity of Defendants and documents relating to same.	1.20 276.00/hr	331.20
	SSA	Drafted email to Sonila Themeli regarding monthly support payment to Gio Benvenuto.	0.30 276.00/hr	82.80
12/21/2022	SSA	Reviewed and commented on subpoena to Google for cloud documents. Drafted email regarding same. Researched for leader email addresses assigned by CFX. Telephone call from Sonila Themeli regarding same.	0.70 276.00/hr	193.20
12/22/2022	SGH	Reviewed and edited the Motion for Contempt. Provided suggested edits and additional information.	0.60 362.00/hr	217.20
	SGH	Drafted an affidavit to attach to the Motion for Contempt. Researched document to use as exhibits and organized the exhibits. Drafted email to Sonila Themeli regarding the exhibits for the Motion for Contempt showing millions of dollars were transferred after the TRO (.9). Drafted an Affidavit explaining the Exhibits and where they were located. Researched additional information (1.6). Prepared an analysis to included in Exhibit D along with a chart of the \$7 million in transactions after the TRO (1.5). Drafted email to Sonila Themeli explaining the issues (.3).	4.30 362.00/hr	1,556.60
	SSA	Reviewed and verified content of Motion to show cause.	0.40 276.00/hr	110.40
12/23/2022	SGH	Updated Exhibit D to my Affidavit for the Motion to Compel. Reviewed edits to Affidavit and updated for new figures. Finalized the affidavit.	1.50 362.00/hr	543.00
	SSA	Updated affidavit as attachment to Motion to Show Cause and exhibits to same.	1.00 276.00/hr	276.00
12/27/2022	SGH	Reviewed draft of affidavit of Receiver for the Motion for Contempt and provided comments (.4). Researched issues regarding the Apple computer for the contempt motion and researched Relativity for purchase of an Apple computer by Chavez. Located information on several computers purchased by CFX and drafted email to Sonila Themeli regarding same (1.2). Researched information on case law providing there is no 5th amendment privilege on work product prepared for the business. Drafted email to Sonila Themeli regarding same (.5).	2.10 362.00/hr	760.20

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/29/2022	SSA Reviewed lease agreement and documents produced by Chavez's landlord. Drafted email regarding same.	0.40 276.00/hr	110.40
	Subtotal	117.70	35,059.40
<u>Status Reports</u>			
11/12/2022	SGH Telephone call to Sonila Themeli regarding Receiver's First Interim Report.	0.30 362.00/hr	108.60
11/13/2022	SGH Drafted outline of Receiver's First Interim Report. Researched issue and assigned duties of sections of the report to be completed by the Receiver team. Email to Sonila Themeli regarding same and preparing the First Interim Report.	2.50 362.00/hr	905.00
11/14/2022	SGH Reviewed documents in the Kiteworks share file regarding various issues for the First Interim Report.	0.60 362.00/hr	217.20
11/17/2022	SGH Reviewed and edited issues for First Interim Report. Prepared a Excel file of funds invested to use as a Exhibit to the First Interim Report.	1.50 362.00/hr	543.00
	SGH Researched issues for First Interim Report.	0.40 362.00/hr	144.80
11/18/2022	SGH Reviewed issues for First Interim Report. Researched information in Relativity for the report. Continued to update the report of on-going investor activities and search for people involved in Relativity. This report on the on-going activities will be an Exhibit to First Interim Report.	3.00 362.00/hr	1,086.00
11/21/2022	SGH Prepared draft of graph to show the funds raised from investors to be used as Exhibit in the report. Reviewed and input the figures for January and February. Drafted an email to the receiver regarding the chart for the report.	0.90 362.00/hr	325.80
	SGH Continued researching issues for the First Interim Report. Reviewed emails regarding SEO optimization and hits on the receiver's website to mention in report.	0.40 362.00/hr	144.80
	SGH Research issues for First Interim Report.	0.70 362.00/hr	253.40
11/22/2022	SGH Reviewed draft of First Interim Report and sent comments to Receiver Team. Reviewed documents researched in Relativity. Drafted language for report regarding lack of accounting. Reviewed the flow charts to calculated the direct and indirect sponsors for bonuses. Drafted email to Receiver regarding report. Continued reviewing documents in Relativity for accounting records to updated the Excel analysis of the total fraud.	3.50 362.00/hr	1,267.00
11/23/2022	SGH Telephone call to Sonila Themeli regarding the report and issues for report and what should be a Exhibit to the report.	0.50 362.00/hr	181.00
11/27/2022	SGH Reviewed and edited First Interim Report.	0.40 362.00/hr	144.80
11/28/2022	SGH Updated analysis of the total funds invested and the number of investors. Updated the graph for the First Interim Report. Researched figures for revenues and investors.	3.00 362.00/hr	1,086.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/28/2022	SGH	3.00	1,086.00
		362.00/hr	
	SSA	1.50	414.00
		276.00/hr	
	Subtotal	22.20	7,907.40
	<u>Tax Issues</u>		
10/4/2022	SSA	0.30	82.80
		276.00/hr	
10/13/2022	SSA	0.90	248.40
		276.00/hr	
10/14/2022	JRJ	0.90	248.40
		276.00/hr	
10/20/2022	JRJ	1.10	303.60
		276.00/hr	
10/21/2022	SSA	0.20	55.20
		276.00/hr	
11/1/2022	SSA	0.30	82.80
		276.00/hr	
11/3/2022	SSA	0.60	165.60
		276.00/hr	
11/8/2022	SSA	0.30	82.80
		276.00/hr	
	Subtotal	4.60	1,269.60
	For professional services rendered	447.90	\$132,832.40

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Additional Charges :

<u>Expenses</u>	<u>Amount</u>
9/30/2022 Expense Report - Scott Askue trip to Houston on September 19 and September 20. Airfare (\$481.20), Hotel (\$241.14), car rental(210.26), meals (\$36.37), mileage (\$35.00) and parking (\$99.58).	1,103.55
10/12/2022 Copying cost - 102 pages of bank records	15.30
10/31/2022 IDI reverse phone search	4.50
Expense Report - Scott Askue trip to Houston on September 30 and October 1. Airfare (\$431.20), Hotel (\$151.90), car rental (\$267.89), meals (\$43.98), mileage (\$35.00) and parking (\$41.12).	971.09
12/31/2022 Pacer on-line charges	53.70
Subtotal	2,148.14
Total costs	\$2,148.14
Total amount of this bill	\$134,980.54

Hays Financial Consulting, LLC
Biographical Information of Forensic Accountants

S. Gregory Hays, Managing Principal

Mr. Hays is a court appointed fiduciary and forensic accountant that has been involved in a broad array of engagements primarily focused on restructuring and winding down insolvent companies and investigating fraud. He is routinely appointed by federal and state courts as trustee or receiver to manage businesses and other assets to maximize recovery. Mr. Hays has served as a federal receiver or forensic accountant to federal receiver in over 18 cases. He had been a key role in over 27 Ponzi schemes cases as a fiduciary, forensic accountant, or expert witness. He has over 40 years of financial experience, including over 30 years managing bankruptcy and receivership cases and investigating fraudulent activity. He is a Certified Turnaround Professional (“CTP”) and a Certified Insolvency and Restructuring Advisor (“CIRA”) and serves on the Board of Directors for the Association of Insolvency & Restructuring Advisors (“AIRA”). He is former President of the National Association of Federal Equity Receivers (“NAFER”). He holds a Master of Business Administration in Finance from Georgia State University and a Bachelor of Business Administration in Finance from Stetson University.

Standard Hourly Rate for 2023:	\$	425.00
Discounted Hourly Rate for CFX:	\$	362.00
Total Fees this Application:	\$	61,576.20

Scott Askue, Managing Director

Mr. Askue has 25 years of experience in bankruptcy and receivership management. He provides financial consulting services including: investigative, financial analysis, asset recovery, liquidation, litigation consulting, forensic accounting, avoidance action analysis, claims analysis, and data conversion and management. Mr. Askue manages insolvency cases involving many types of businesses. He has serves as the primary forensic accountant on the firm’s’ fraud investigation cases including actions brought by the SEC, FTC and the CFTC. He holds a Masters in Finance from Georgia State University and a Bachelors of Science in Management from Georgia Institute of Technology.

Standard Hourly Rate for 2023:	\$	325.00
Discounted Hourly Rate for CFX:	\$	276.00
Total Fees this Application:	\$	62,017.20

Dwaine Butler, Director of Real Estate

Mr. Butler is a Director and manages the real estate aspects or the firms’ receiver and trustee cases and provides assistance forensic accounting matters. He has been employed by the firm for 15 years and has actively managed distressed and bank owned real estate projects. Mr. Butler supervises the takeover of insolvent companies and distressed properties. Additional responsibilities include the management and liquidation of assets and funds tracing. Mr. Butler is a Certified Property Manager (“CPMC”) and an active member of the nationally recognized, Institute of Real Estate Management (“IREM”). He attended Morris Brown College where he received his Bachelor of Science degree. He currently serves as a local member of IREM Georgia

Chapter 67 and is an active alumni member of Kappa Alpha Psi, Fraternity, Inc., Diversity Council Board Member

Standard Hourly Rate for 2023:	\$ 225.00
Discounted Hourly Rate for CF:	\$ 170.00
Total Fees this Application:	\$ 8,687.00

Jim Jennings, Tax Director

Mr. Jennings is a CPA and has over 25 years' experience in dealing with the tax aspects of insolvency cases. He has been employed with Hays Financial for over ten years and provides tax advice and prepares all the tax returns in the firm's fiduciary cases. He has extensive experience in the administration of Chapter 11 Debtor in Possession, receivership, and other insolvency cases. He holds a Master of Taxation degree from Georgia State University and a Bachelor of Arts in Business with a concentration in Finance from Michigan State University.

Standard Hourly Rate for 2023 is	\$ 325.00
Discounted Hourly Rate for CFX:	\$ 276.00
Total Fees in this Application:	\$ 552.00

Standard Hourly Rate for 2023 is \$325.

Discounted Hourly Rate for CFX \$